REMARKS/ARGUMENTS

This Amendment is in response to the Office Action mailed December 9, 2005. Claims 1-34 were pending in the present application. This Amendment amends claims 1, 15, and 22, leaving pending in the application claims 1-34. Reconsideration of the rejected claims is respectfully requested.

I. Rejection under 35 U.S.C. §102

Claims 1-8, 11, 15-18, and 20-28 are rejected under 35 U.S.C. §102(b) as being anticipated by *Havinis* (US 6,104,931). Applicants respectfully submit that *Havinis* does not disclose or suggest each element of these claims.

For example, Applicants' claim 1 as amended recites a method for obtaining location information for a wireless unit of interest in a wireless network, comprising:

> providing a system operative to procure location information for a wireless unit of interest from at least one location information source associated with the wireless network;
> establishing an interface for communications between said system and an entity requesting location information for said wireless unit of interest, wherein said interface defines a standardized format for requesting and providing said location information;
> verifying authorization for said entity to obtain location information for said wireless unit of interest independent of location finding preferences of said wireless unit of interest;
> obtaining, from said system, location information for said wireless unit of interest;
> **analyzing the location information to monitor a location of the wireless unit over time; and**
> **providing said monitored location information to a recipient associated with said request**

(*emphasis added*). Such limitations are not disclosed by *Havinis*.

Havinis discloses defining location services in a simplified manner, wherein an entity such as an emergency center or law enforcement agency can override the privacy settings of subscribers to obtain location information (col.3, lines 43-63; col. 4, lines 35-55). *Havinis* does not, however, disclose or suggest the monitoring of such a device over time, as recited in Applicants' claim 1. The office action of December 9 recognizes that *Havinis* is silent on "comparing said location information to at least one location of interest to monitor the movement of said wireless unit relative to said point of interest" (OA p. 7). In fact, *Havinis* does not mention monitoring or tracking at all, instead

disclosing obtaining an instance of positioning information in response to a specific request or triggering event. As such, *Havinis* cannot anticipate Applicants' claim 1 or dependent claims 2-8 and 11. Independent claims 15 and 22 recite limitations that similarly are not disclosed or suggested by *Havinis*. Applicants therefore respectfully request that the rejection with respect to claims 1-8, 11, 15-18, and 20-28 be withdrawn.

II Rejection under 35 U.S.C. §103

Claims 9 and 19 are rejected under 35 U.S.C. §103(a) as being obvious over *Havinis* in view of *Bar* (US 6,456,852). Claims 9 and 19 depend from claims 1 and 15, respectively, which are not rendered obvious by *Havinis* for reasons including those listed above. *Bar* does not make up for these deficiencies in *Havinis* with respect to claims 1 and 15.

Bar discloses a system for distributing real time information of cellular phone users to various third party information subscribers (col. 2, lines 9-23), and is cited as teaching "combining several different location determining methods to define the location of a user" (OA p. 6). Such teaching still would not make up for the deficiencies in *Havinis* with respect to claims 1 and 15, however, as *Bar* fails to teach or suggest analyzing location information to monitor a location of the wireless unit over time, and providing the monitored location information to a recipient associated with said request. As such, *Bar* cannot render obvious claims 1 and 15, or dependent claims 9 and 19, alone or in combination with *Havinis*.

Claim 10 is rejected under 35 U.S.C. §103(a) as being obvious over *Havinis* in view of *Havinis #2* (US 6,360,102). Claim 10 depends from claim 1, which is not rendered obvious by *Havinis* as discussed above. *Havinis #2* does not make up for these deficiencies in *Havinis* with respect to claim 1.

Havinis #2 discloses a telecommunications system for allowing each mobile subscriber subscribing to mobile services to define a profile that contains a list of preferred subscribers that have permission to position the mobile subscriber (col. 4, lines 5-27). *Havinis #2* is cited as teaching the requiring of a court order to allow a law enforcement agent to determine the position of a person (OA p. 6). Such teaching still would not make up for the deficiencies in *Havinis* with

respect to claims 1 and 15, however, as *Havinis #2* fails to teach or suggest analyzing location information to monitor a location of the wireless unit over time, and providing the monitored location information to a recipient associated with said request. As such, *Havinis #2* cannot render obvious claims 1 and 15, or dependent claims 9 and 19, alone or in combination with *Havinis*.

Claims 12-14 and 29-34 are rejected under 35 U.S.C. §103(a) as being obvious over *Havinis* in view of *Melton* (US 5,255,306). Claims 12-14 depend from claim 1, and claims 29-30 depend from claim 22, which are not rendered obvious by *Havinis* as discussed above. Claim 31 (and dependent claims 32-34) recites limitations that similarly are not rendered obvious by *Havinis*. *Melton* does not make up for these deficiencies in *Havinis* with respect to these claims.

Melton discloses a house arrest system including an ankle or wrist bracelet and a field monitoring device for receiving a signal from the bracelet (col. 3, line 44-col. 4, line 4). A cellular interface connects the field monitoring device with a cellular network to allow for house arrest independent of whether the house has a telephone installed (col. 4, lines 5-25). The field monitoring device does not actually monitor position, as recited in these claims, but instead makes only a binary (yes/no) determination as to whether or not the bracelet is within a given range of the single field monitoring device. As such, *Melton* cannot render these claims obvious. Further, as *Havinis* is directed to locating a device at an unknown location, there would be no motivation to combine *Havinis* with the teachings of *Melton*, which only determines if a device is within a known area, and offers no ability to locate the device when outside that area. As such, claims 1, 22, and 31, and dependent claims 12-14, 29-30, and 32-34 cannot be rendered obvious by *Havinis* and *Melton*, either alone or in combination.

Applicants therefore respectfully request that the rejections with respect to claims 9, 10, 12-14, 19, and 29-34 be withdrawn.

III. Amendment to the Claims

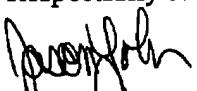
Unless otherwise specified, amendments to the claims are made for purposes of clarity, and are not intended to alter the scope of the claims or limit any equivalents thereof. The amendments are supported by the specification and do not add new matter to the specification.

CONCLUSION

In view of the foregoing, Applicants believe all claims now pending in this Application are in condition for allowance. The issuance of a formal Notice of Allowance at an early date is respectfully requested.

If the Examiner believes a telephone conference would expedite prosecution of this application, please telephone the undersigned at 415-576-0200.

Respectfully submitted,



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